

2007 RF 93

# STATE OF COLORADO

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ACTION

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NEDETTI, R.L.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
NJAMIN, A.		
MAN, H.S.		
BNIVAL, G.J.		
PP, R.D.		
RODOVA, R.C.		
VIS, J.G.		
RRERA, D.W.		
NNI, B.J.		
ALY, T.J.		
DAHL, T.G.		
BIG, J.G.		
BY, W.A.		
ESTER, A.W.		
E, E.M.		
NN, H.P.		
RX, G.E.		
KENNA, F.G.		
ORGAN, R.V.		
ZUTO, V.M.		
TER, G.L.		
EY, J.H.		
NOLIN, N.B.		
TERWHITE, D.G.		
HUBERT, A.L.		
TLOCK, G.H.		
EPLE, R.L.		
LLIVAN, M.T.		
ANSON, E.R.		
LKINSON, R.B.		
SON, J.M.		
NE, J.O.		

Trndt MXX

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ORRES CONTROL	x	x

Reviewed for Addressee  
Corres. Control RFP

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DATE BY

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## COLORADO DEPARTMENT OF HEALTH

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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May 4 3 45 PM '93

EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL



Roy Romer  
Governor

Patricia A. Nolan, M.D.  
Executive Director

April 26, 1993

Mr. Richard J. Schassburger  
U.S. Department of Energy  
Rocky Flats Office, Bldg 116  
P.O. Box 928  
Golden, Colorado 80402-0928

RE: Final Phase I RFI/RI Workplan for OU 13 - The 100 Area; March 10, 1993

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division is withholding approval of this Workplan. The Division's comments are attached. EPA's comments will be forwarded under separate cover.

As you may be aware, the Division has had significant problems with numerous aspects of the draft and final versions of this Workplan, as delineated in our comments. The March 10, 1993 submittal is the third version of this Workplan submitted to the Division and we are very disappointed that many of these concerns and conditions remain unresolved.

Several of the conditions specified in the Division's November 10, 1992 comment letter have not been adequately addressed in the revisions to the Workplan as submitted March 10, 1992. In order for the Division to approve this Workplan these conditions must be satisfied. The conditions that remain unsatisfied are itemized in the attached comments and include:

- an adequate surficial soil sampling plan;
- clarification of radiological survey over areas with pavement;
- required ground water contamination plume delineation.

In addition, specific comments to the revised portions of the Workplan are included.

The Division requires that DOE satisfy the above conditions as follows:

- Surficial Soil Sampling Plan:
  - 1) replace Section 5.1.2.5.3 with revised section contained in Attachment I
  - 2) modify Table 6.2 and Figures 6-3 through 6-10 as shown in Attachment II
  - 3) revise text in section 6.3 to be consistent with items 1 and 2, above.
- Radiological Survey over Areas with Pavement:
  - 1) revise DQO and FSP in section 5.1.2.5.1 and section 6.3 to clarify that the HPGe survey will not be used for characterizing potential contamination under pavement or fill;
  - 2) revise text in section 6.3 to indicate that the surficial soil sampling program has been structured to begin radionuclide characterization of paved and fill covered areas;

ADMIN RECORD

- 3) the revised text should indicate that the HPGe survey is still useful for screening potential contamination on the surface (pavement or soil).
- Ground Water Contamination Plume Delineation:
    - 1) revise the text in section 5.1.2.5 to specifically acknowledge that plume delineation will occur when ground water contamination has been confirmed;
    - 2) add plume delineation to stage 3 objectives for ground water in Table 5.2.
  - Specific comments to the revised Workplan:
    - 1) make all clarifications and modifications to the Workplan as specified in the specific comments.

These conditions should be addressed by DOE and an approvable Workplan submitted by June 1, 1993 or prior to field work commencing, whichever is earlier. DOE was required to submit an approvable version of this Workplan on October 12, 1992. Since this did not occur, DOE has technically been in violation of the IAG since that date. If the conditions itemized in this letter are not satisfied by June 1, 1993 or prior to field work commencing, whichever is earlier, the Division will explore it's enforcement options.

Revision of this Workplan can be accomplished by submitting updated replacement pages, figures, and tables or entire sections, as appropriate. There is no need to resubmit the entire Workplan.

If you have any questions regarding these matters, please call Jeff Swanson of my staff at 692-3416.

Sincerely,



Gary W. Baughman, Chief  
Facilities Section  
Hazardous Waste Control Program

cc: Martin Hestmark, EPA  
Robert Birk, DOE  
~~Mike Arndt~~, EG&G  
Mike MCHugh, EG&G  
Jackie Berardini, CDH-OE  
Dan Miller, AGO